REMARKS

Claims 1 through 21 are pending. In an office action mailed February 5, 2004 (paper no. 3), claims 10-21 were rejected under 35 U.S.C. 101 because the claimed invention is allegedly directed to non-statutory subject matter. Claims 1-19 were rejected under 35 U.S.C. 112 as allegedly being based on a disclosure that is not enabling. Claims 10-21 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of U.S. Patent 6,308,163 (Du). Claims 1-9 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of ARTICLE 1998. Claims 1-9 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of U.S. Patent 6,415,277 (Klatt). These rejections are respectfully traversed. The Applicants appreciate the guidance received from the Examiner in a telephone conference on May 17, 2004 in addressing the rejections under 35 U.S.C. 101 and 35 U.S.C. 112.

Rejections under 35 USC 101

Claims 10-21 were rejected under 35 U.S.C. 101 because the claimed invention is allegedly directed to non-statutory subject matter. Claims 10 and 19 have been amended to overcome this rejection. Claims 11 through 18 depend from claim 10, and claims 20-21 depend from claim 19, and are believed to be allowable because of the amendments to claims 10 and 19. Withdrawal of the rejection is respectfully requested.

Rejections under 35 USC 112

Claims 1-9 were rejected under 35 U.S.C. 112 because the disclosure is allegedly non-enabling. Claim 1 has been amended to overcome this rejection. Claims 2 through 9 depend from claim 1 and are believed to be allowable because of the amendment to claim 1. Withdrawal of the rejection is respectfully requested.

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Rejections under 35 U.S.C. 102 and 103

Claims 10-21 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of U.S. Patent 6,308,163 (Du). Claims 1-9 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of ARTICLE 1998. Claims 1-9 were rejected under both 35 U.S.C. 102(b) and 103(a) as being anticipated or obvious in light of U.S. Patent 6,415,277 (Klatt). These rejections are respectfully traversed.

Du, ARTICLE 1998, and Klatt each fail to provide a basis for the rejection of claims 1-21 under either 35 U.S.C. 102 or 35 U.S.C. 103, because they fail to disclose each element of the claimed invention, either alone or in combination. In particular, Du fails to disclose "using a plurality of helpers that obtain data from one or more process thread processes and that obtain data from one or more business objects in response to the data received from the process thread processes, comprising: a computer implemented method that further comprises: receiving order data; initializing and executing one or more helpers in response to the order data; generating an order using the one or more helpers; and processing the order using the one or more helpers." Instead, Du at Figs. 2, 6 and 7, col. 4, lines 35-55, and col. 10, line 45 to col. 11 line 35 discloses a hierarchical structure of local resource managers, site GRMs (SRMs), and enterprise GRMs (ERMs), where "more than one resource is required to perform" order processing (col. 11, lines 8-9). The LRMs, SRMs, and ERMs are not initialized in response to an order – instead, a "discovery model 146 element 'discovers' local resource managers and the types of resources that they handle" (col. 10, lines 41-43). Likewise, it is improper to classify the LRMs, SRMs, and ERMs as being the same as helpers – they are each heirarchically different, whereas no hierarchical relationship is defined between the one or more helpers of claim 10. Furthermore, where a number of elements or features of the claims are entirely missing from a reference, the reference fails to provide a prima facie basis for rejection of the claims under 35 U.S.C. 103.

In regards to claim 19, Du fails to disclose or render obvious a "method for performing enterprise resource management using a plurality of helpers that obtain data from one or more process thread processes and that obtain data from one or more business objects in response to the data received from the process thread processes, comprising: a computer-implemented method that further comprises: receiving field data; initializing and executing one or more

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helpers in response to the field data; and storing the field data using the one or more helpers."
As described above, Du discloses an hierarchical architecture that does not use a plurality of
helpers that obtain data from one or more process thread processes and that obtain data from one
or more business objects in response to the data received from the process thread processes.
Furthermore, where a number of elements or features of the claims are entirely missing from a
reference, the reference fails to provide a prima facie basis for rejection of the claims under 35
U.S.C. 103.

Likewise, in regards to ARTICLE 1998, claim 1 includes a "system for enterprise
resource management comprising: a plurality of computer-implemented systems further
comprising: a purchase order helper system receiving purchase order entry data and generating
purchase order data; a sales order helper system receiving sales order entry data and generating
sales order data; an inventory control helper system coupled to the purchase order system and the
sales order system, the inventory control helper system generating inventory control data; and a
general ledger helper system coupled to the purchase order helper system, the sales order helper
system, and the inventory control helper system, the general ledger helper system generating
general ledger data, wherein one or more of the helper systems receives data from one or more
process thread processes and obtains data from one or more business objects in response to the
data received from the process thread processes." The cited abstract of ARTICLE 1998, as well
as the remainder of ARTICLE 1998, entirely fails to disclose or render obvious helper systems
that receive data from one or more process thread processes and that obtain data from one or
more business objects in response to the data received from the process thread processes, as it
fails to even mention numerous features of such helper systems, and merely discloses the general
concept of a computer system that can be used to assist with material requirement planning.
Furthermore, where a number of elements or features of the claims are entirely missing from a
reference, the reference fails to provide a prima facie basis for rejection of the claims under 35
U.S.C. 103.

Klatt also fails to disclose or render obvious a "system for enterprise resource
management comprising: a plurality of computer-implemented systems further comprising: a
purchase order helper system receiving purchase order entry data and generating purchase order

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data; a sales order helper system receiving sales order entry data and generating sales order data; an inventory control helper system coupled to the purchase order system and the sales order system, the inventory control helper system generating inventory control data; and a general ledger helper system coupled to the purchase order helper system, the sales order helper system, and the inventory control helper system, the general ledger helper system generating general ledger data, wherein one or more of the helper systems receives data from one or more process thread processes and obtains data from one or more business objects in response to the data received from the process thread processes." Instead, Klatt merely discloses at Figs. 2, 12, and 13 and col. 4 lines 1-15, col. 6 lines 12-17 and col. 9 lines 10-20 a rules-based system that uses SQL to query a database. There is no disclosure or suggestion of helper systems that receive data from one or more process thread processes and that also obtain data from one or more business objects in response to the data received from the process thread processes. Furthermore, where a number of elements or features of the claims are entirely missing from a reference, the reference fails to provide a prima facie basis for rejection of the claims under 35 U.S.C. 103.

Claims 2 through 9 depend from claim 1, claims 11 through 18 depend from claim 10, and claims 20 and 21 depend from 19, and each are allowable at least for the reasons that they depend from an allowable base claim and add limitations not found in the prior art. Withdrawal of the rejections and allowance of all pending claims is requested.
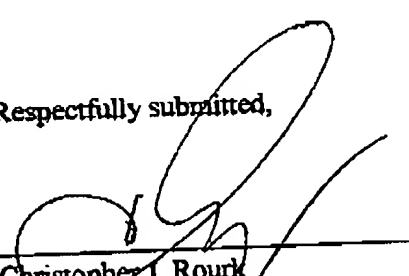
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CONCLUSION

In view of the foregoing remarks and for various other reasons readily apparent, Applicants submit that all of the claims now present are allowable, and withdrawal of the rejection and a Notice of Allowance are courteously solicited.

If any impediment to the allowance of the claims remains after consideration of this amendment, and such impediment could be alleviated during a telephone interview, the Examiner is invited to telephone the undersigned at (214) 969-4669 so that such issues may be resolved as expeditiously as possible.

An additional fee of $110 for a one-month extension of time is believed to be due, and a petition therefore is hereby made. No additional fee is believed to be due. If any applicable fee or refund has been overlooked, the Commissioner is hereby authorized to charge any fee or credit any refund to the deposit account of Akin, Gump, Strauss, Hauer & Feld, L.L.P., No. 01-0657.

Respectfully submitted,

Date: _5/28/04_

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